

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STEVE ILYAYEV,

Plaintiff,

v.

EXPERIAN,

Defendant.

CASE NO. 1:25-cv-00738

NOTICE OF REMOVAL

Karl Colbary
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*Attorney for Defendant
Experian Information Solutions, Inc.*

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian hereby files this Notice of Removal of the above-captioned action to this Court and state as follows:

1. The Complaint in the State Court Action was filed with the Clerk of the Queens County Civil Court on January 3, 2025.

2. This Notice is being filed with this Court on the first business day following the thirtieth day after Experian received a copy of a summons and Plaintiff's initial pleading setting forth the claims for relief upon which Plaintiff's action is based.

3. This Court is the proper district court for removal because the State Court Action is pending within this district.

4. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon the sole defendant in the State Court Action is attached hereto as **Exhibit A**.

5. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a "consumer reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

6. The claims for relief alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

7. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff through his attorney of record in the State Court Action, and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: February 10, 2025

Respectfully submitted,

/s/ Karl Colbary

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